

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

JACKI EASLICK, LLC, *et al.*,

Plaintiffs,

v.

CJ EMERALD, *et al.*,

Defendants.

Civil Action No. 2:23-cv-2000

**FILED UNDER SEAL**

**MOTION FOR 1) TEMPORARY RESTRAINING ORDER; 2) ORDER RESTRAINING  
ASSETS AND MERCHANT STOREFRONTS; 3) ORDER TO SHOW CAUSE WHY A  
PRELIMINARY INJUNCTION SHOULD NOT ISSUE; AND 4) ORDER  
AUTHORIZING EXPEDITED DISCOVERY**

Plaintiffs now move this Court for an Order granting their *Ex Parte* Application for: 1) a temporary restraining order; 2) an order restraining assets and Merchant Storefronts (as defined *infra*); 3) an order to show cause why a preliminary injunction should not issue; and 4) an order authorizing expedited discovery against the Defendants identified on **Schedule “A”** to the Complaint (collectively, the “Defendants”). The legal support for this motion is contained in the accompanying Memorandum of Law. The evidence supporting this motion is contained in the Declarations of Jacki Easlick, Stanley D. Ference III, Brian Samuel Malkin, and Dee Odell, as well as the Expert Declaration of Nicholas Mesiti, filed therewith, and the exhibits attached thereto. A proposed order is filed herewith.

Respectfully submitted,

Dated: November 20, 2023

/s/ Stanley D. Ference III

Stanley D. Ference III

Pa. ID No. 59899

courts@ferencelaw.com

Brian Samuel Malkin

Pa. ID No. 70448

bmalkin@ferencelaw.com

FERENCE & ASSOCIATES LLC

409 Broad Street

Pittsburgh, Pennsylvania 15143

(412) 741-8400 – Telephone

(412) 741-9292 – Facsimile

Attorneys for Plaintiffs